# MCNAIR LAW FIRM, P.A. ATTORNEYS AND COUNSELORS AT LAW

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May 19, 2005

#### VIA HAND DELIVERY

Mr. Charles L. A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission Synergy Business Park, The Saluda Building 101 Executive Center Drive Columbia, South Carolina 29210

Re: Generic Proceeding to Investigate Emergency Services Continuity Plans

**Docket No. 2005-100-C** 

Dear Mr. Terreni:

Enclosed for filing on behalf of the South Carolina Telephone Coalition, please find the original and ten (10) copies of a Petition to Intervene in the above-referenced matter. By copy of this letter and Certificate of Service, all parties of record are being served with a copy of this Petition by U. S. Mail.

Please clock in a copy and return it with our courier.

Thank you for your assistance.

Very truly yours,
Mayaut U. Jax

Margaret M. Fox

MMF/rwm Enclosures

cc: Parties of Record

## **BEFORE** THE PUBLIC SERVICE COMMISSION SOUTH CAROLINA

Docket No. 2005-100-C

IN RE:	Generic Proceeding to Investigate Emergency Services Continuity Plans	)	PETITION TO INTERVENE
		)	

The South Carolina Telephone Coalition ("SCTC") respectfully submits the within Petition to Intervene in the above-referenced docket. In support of its Petition, SCTC would respectfully show unto this honorable Commission:

- SCTC is a coalition of incumbent local exchange telephone companies 1. organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."
- 2. This generic proceeding was established pursuant to Commission Order No. 2003-218 to investigate the general concept of emergency services continuity plans and their various ramifications.
- SCTC seeks to intervene in this proceeding with full rights to participate as a 3. party of record in so far as its interests might appear.
- SCTC has not yet fully developed a position with respect to this proceeding. 4. However, as local exchange carriers who serve as carriers of last resort in their respective service areas, SCTC member companies have a direct and substantial interest in this proceeding an OK Dhell

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directly affected by its outcome. Furthermore, SCTC member companies are in a position to assist the Commission with this generic investigation by providing relevant information to the Commission with respect to the issues that will be investigated and addressed in this docket.

5. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.

Margaret M. Fox

McNair Law Firm, P.A.

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Columbia, South Carolina 29211

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pfox@mcnair.net

ATTORNEYS FOR THE SOUTH CAROLINA TELEPHONE COALITION

Columbia, South Carolina May 19, 2005

### **South Carolina Telephone Coalition Member Companies**

Bluffton Telephone Company, Inc.

Chesnee Telephone Company

Chester Telephone Company

Farmers Telephone Cooperative, Inc.

Ft. Mill Telephone Company, d/b/a Comporium Communications, Inc.

Hargray Telephone Company, Inc.

Home Telephone Company, Inc.

Horry Telephone Cooperative, Inc.

Lancaster Telephone Company, d/b/a Comporium Communications, Inc.

Lockhart Telephone Company

McClellanville Telephone Company

Norway Telephone Company

Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.

PBT Telecom, Inc.

Ridgeway Telephone Company

Rock Hill Telephone Company, d/b/a Comporium Communications, Inc.

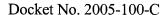
Sandhill Telephone Cooperative, Inc.

St. Stephen Telephone Company

West Carolina Rural Telephone Cooperative, Inc.

Williston Telephone Company

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA



IN RE:	Generic Proceeding to Investigate Emergency Services Continuity Plans	) ) )	CERTIFICATE OF SERVICE
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I, Rebecca W. Martin, Secretary for McNair Law Firm, P. A., do hereby certify that I have this date served one (1) copy of the attached Petition to Intervene regarding the above–referenced matter on the following parties of record by causing said copy to be deposited with the United States Mail, first class postage prepaid, affixed thereto and addressed as follows:

C. Dukes Scott, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, South Carolina 29211

Patrick W. Turner, Esquire BellSouth Telecommunications, Inc. Post Office Box 752 Columbia, South Carolina 29202 Scott A. Elliott, Esquire Elliott & Elliott 721 Olive Street Columbia, South Carolina 29205

Stan Bugner Verizon South, Inc. 1301 Gervais Street, Suite 825 Columbia, South Carolina 29201

Rebecca W. Martin McNair Law Firm, P.A. Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

May 19, 2005

Columbia, South Carolina